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October 8, 1998

HAND DELIVERED

Magalie R. Salas, Esquire
Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, D.C. 20554

Re: CC Docket No. 98-146

Dear Ms. Salas:

Enclosed are the original and nine (9) copies of the Reply Comments of the Internet Service Providers' Consortium for filing in the above-referenced docket.

Kindly date-stamp and return the extra copy of this cover letter.

If there are any questions about this filing, please call me at the number above.

Respectfully submitted,


Mitchell Lazarus

Counsel for Internet Service Providers' Consortium

ML:deb

Enclosures

cc: Service List
Ms. Deb Howard, ISP/C
Ms. Roxanna Loveday, ISP/C
Mr. Charles T. Smith, Jr., ISP/C
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ORIGINAL -

Before the
Federal Communications Commission
Washington DC 20554

In the Matter of)

)
Inquiry Concerning the Deployment of)
Advanced Telecommunications Capability)
to All Americans in a Reasonable and Timely)
Fashion, and Possible Steps to Accelerate)
Such Deployment Pursuant to Section 706)
of the Telecommunications Act of 1996)

CC Docket No. 98-146

**REPLY COMMENTS OF
THE INTERNET SERVICE PROVIDERS' CONSORTIUM**

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**REPLY COMMENTS OF
THE INTERNET SERVICE PROVIDERS' CONSORTIUM**

The Internet Service Providers' Consortium (ISP/C) hereby submits these Reply Comments in response to the Notice of Inquiry in the above-captioned proceeding.¹

The ISP/C is the voice of independent Internet service providers (ISPs). It has more than 230 company members headquartered in more than 42 U.S. states and 10 countries, with over 1 million subscribers in the aggregate. A list of members is attached as Appendix A.²

A. The Commission Should Require Not Only the RBOCs and GTE, But Also Their Advanced Services Affiliates, to Comply with Computer III Protections.

The ISP/C's first-round comments noted that RBOCs and GTE not only compete with the independent ISPs for the same retail ISP customers, but are also essential providers to most ISPs,

¹ Inquiry Concerning the Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion, and Possible Steps to Accelerate Such Deployment Pursuant to Section 706 of the Telecommunications Act of 1996, CC Docket No. 98-146, Notice of Inquiry, FCC 98-187 (released Aug. 7, 1998) ("Notice").

² Not all members listed have individually reviewed and approved this pleading. Additional information about the ISP/C is available at <http://www.ISPC.org>.

which depend on the RBOCs or GTE for local loops and data lines. This combination gives the RBOCs and GTE both the incentive and the opportunity to discriminate against independent ISPs.³ Indeed, there are credible allegations in the record that such discrimination has occurred.⁴

The Computer III regime is intended specifically to prevent the RBOCs and GTE from misusing their facilities monopoly to disadvantage competing providers of information services, including ISPs. Advanced services are basic services under Computer III. The RBOCs and GTE are therefore required under Computer III to unbundle advanced services and make them available to competing ISPs at nondiscriminatory rates, terms, and conditions.

The Commission's proposal to allow the ILECs to avoid the strict terms of their Section 251 unbundling and resale obligations by providing advanced services through structurally separate affiliates should help to protect CLECs from anticompetitive behavior, but will do nothing to protect the "pure ISPs" — those that are not also CLECs. To prevent the affiliate from improperly exploiting the parent's facilities monopoly, Computer III protections must apply to the RBOC or GTE affiliate just as they do to the parent company.⁵ Similarly, the

³ Other parties agree. *See* Comments of America Online, Inc. at 4, 12; Comments of the Coalition of Utah Independent Internet Service Providers at 3; Comments of Commercial Internet Exchange Association at 17-18; Joint Comments of MCI Communications Corporation and Worldcom, Inc. at 28; Comments of Mindspring Enterprises, Inc. at 16, 19-20; Comments of Retail Internet Providers at 2; Comments of Sprint Corporation at 7-8; Comments of Verio Inc. at 2.

⁴ *See* Comments of Retail Internet Providers at 8; Comments of the Coalition of Utah Independent Internet Service Providers at 3-5; Joint Comments of MCI Communications Corporation and Worldcom, Inc. at 28-29.

⁵ For a detailed analysis of why the affiliate must be subject to Computer III in order to maintain competition, both with and without CLECs in the market, see Comments of Internet Service Providers' Consortium at 8-12 (filed Sept. 14, 1998).

CPNI rules must apply to the advanced services affiliate if the parent company shares CPNI with the affiliate.

Among the ILECs that filed in the first round, only GTE addresses these issues. GTE concedes that the existing common carrier rules, including Computer III, apply to advanced services:

Clearly, there is no reason to believe that the existing panoply of regulations governing such interactions [between ILECs and ISPs] — including the *Computer III*, *ONA*, affiliate transaction, CPNI, and network disclosure rules — require supplementation to be effective.⁶

The ISP/C agrees that no supplementation of the common carrier rules is necessary, so long as the Commission extends Computer III and CPNI to the affiliate as well as the parent company.

B. Tariffing of Computer III Services Remains Essential.

GTE separately asks the Commission to forbear from requiring ILECs to tariff advanced services.⁷ But such forbearance would be a serious mistake, because it would allow the RBOCs and GTE to leverage their facilities monopoly into an improper competitive advantage in the market for ISP services. Moreover, to prevent that result, tariffing obligations must apply not only to the RBOC or GTE, but also to its advanced services affiliate.

GTE states that CLECs, cable companies, CMRS providers, satellite service providers, and electric utilities need not tariff advanced services, and argues that singling out ILECs for tariffing is "profoundly anticompetitive, since it facilitates tacit price collusion among competing providers and permits those companies to delay the introduction of advanced services by the

⁶ Comments of GTE at 21.

⁷ *Id.* at 19.

ILEC through meritless regulatory challenges."⁸ But GTE offers no basis for its fears of "tacit price collusion," and does not explain how such collusion might work. GTE can hardly claim delays from tariff challenges while it is authorized to provide service under two DSL tariffs that are presently the subject of investigation — not on "meritless regulatory challenges," but on genuinely contested issues of jurisdiction.⁹ And GTE understands full well that the ILECs, unlike the other providers it mentions, control the only two-way communications channel now available to most homes and businesses for access to the outside world.

The ISP/C asks that the Commission tariff Computer III offerings related to advanced services. The Commission has long required tariffing of Computer III services to preserve the current level of information available to ISPs and to maintain "national uniformity in nomenclature, terms and conditions and rate structures for ONA services."¹⁰ ISPs depend on the information in these tariffs for planning and improving their operation. The tariffs are an ISP's only assurance that the RBOCs and GTE are dealing the cards with both hands in full view on the table.

If an RBOC or GTE moves its advanced services offerings into an affiliate, the tariffing requirement must follow. In particular, both the parent ILEC and the affiliate must be required at

⁸ *Id.*

⁹ GTE Telephone Operators, CC Docket No. 98-79; GTE System Telephone Companies, CC Docket No. 98-167. The Commission has properly designated these tariffs for hearing. The issue of how DSL should be tariffed is not a foregone conclusion, as GTE and some of the RBOCs seem to believe. Rather, the outcome of these tariff proceedings, along with the present NOI and the related rule making in CC Docket No. 98-147, together will determine how Americans receive communications services for many years into the future. These matters warrant careful consideration.

¹⁰ Filing and Review of Open Network Architecture Plans, 5 FCC Rcd at 3084, 3089 at ¶ 44 (1990).

least to comply with the ONA tariff provisions now applicable to the parent.¹¹ Otherwise the Computer III regime cannot meet its goal of assuring even-handed treatment for all participants in the market for ISP services, ILECs and others alike.

C. The Commission Should Require Cable Operators Providing Broadband Access to an Affiliated ISP to Provide Comparable Access to Unaffiliated ISPs on a Non-Discriminatory Basis.

America Online correctly points out that cable operators control a second broadband route that may provide Internet access for a growing number of users in the future. Cable operators that also provide ISP service will thus be in a position to freeze out competition in much the same way as the RBOCs and GTE are today.¹²

The ISP/C agrees that the Commission's mandate under Section 706 includes not just advanced services offered by telephone providers, but also the broadband infrastructure of the cable companies. The ISP/C also agrees that open access to all broadband facilities is critical to maintaining the competition, innovation, diversity, and consumer choice that characterize the Internet today, as well as to furthering the additional public benefits that broadband services promise. Accordingly, the ISP/C urges the Commission to ensure open and non-discriminatory access to last-mile cable facilities. In particular, cable operators that offer their own ISP service should be required to provide unaffiliated ISPs with comparable access to on a non-discriminatory basis.

¹¹ *Id.*, 5 FCC Rcd 3084, 3089 at ¶ 43 (1990).

¹² Comments of America Online, Inc. at 10.

CONCLUSION

Independent ISPs are vulnerable to unlawful discrimination by the RBOCs or GTE because most ISPs have to compete with the RBOCs or GTE, but are simultaneously dependent on RBOC- or GTE-provided facilities for delivery of services to customers.

ISP/C therefore asks the Commission to maintain the Computer III protections as new technologies appear. If the Commission ultimately adopts its proposal to permit the ILECs to provide advanced services through a separate affiliate, the Computer III ONA requirements must apply nonetheless. In particular, the ONA tariffing provisions must continue in force, and must apply to the affiliate as well as to the parent.

The Commission should also require open and non-discriminatory access to cable facilities used to provide Internet services.

Respectfully submitted,



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October 8, 1998

Counsel for
The Internet Service Providers' Consortium

APPENDIX A

Internet Service Providers' Consortium Membership Roster, September 1998

Company	City	State	Country	FirstName	LastName
.NU Domain LTD	Sherborn	MA	USA	Bill	Semich
2 Cow Herd Internet Services	Venice	CA	USA	Deb	Howard
3Com Corporation / US Robotics	Mount Prospect	IL	USA	Katherine	Sawyer
AboveNet Communications	San Jose	CA	USA	Justin	Newton
ABSnet Internet Services, Inc.	Baltimore	MD	USA	Marc	Siegel
AcroNet Professional Internet Services Inc.	Kenosha	WI	USA	Chris	Pappe
Affordable Connections Internet Company	Pt. Charlotte	FL	USA	Tom	Weems
AlaNet Internet Services, Inc.	Dothan	AL	USA	Jennifer	Watts
Allegany.com Internet Services, Inc.	Warren	PA	USA	Oran	Stewart
Alpine Internet	Carson City	NV	USA	Richard	Hodges
Applied Personal Computing, Inc.	Fairview Heights	IL	USA	Kevin J.	Sawyer
Arisian Software	Jupiter	FL	USA	Mark	Velasquez
Astroarch Consulting, Inc.	Austin	TX	USA	Edward	Haletky
AT&T Networked Commerce Services	Bridgewater	NJ	USA	Pending	
Atlantech Online, Inc.	Silver Spring	MD	USA	Edward J.	Fineran
Atlas Communications	Springfield	MO	USA	Steve	Powell
Bay Networks	Parsippany	NJ	USA	Pending	
Berean Solutions, Inc.	Tupelo	MS	USA	Scott	Thomas
Berkeley Software Design, Inc.	Colorado Springs	CO	USA	Rob	Kolstad
Byte Size Computers	Berryville	AR	USA	Robert	Fowler
CacheFlow Inc.	Palo Alto	CA	USA	Tom	McCafferty
Call Sciences	Edison	NJ	USA	Robert N	Danskin
Canville Communications	West Chester	OH	USA	Dan C.	Rinnert
CapaNet Inc.	Natrona Heights	PA	USA	Tina Marie	CeLane
CapaNet, Inc.	Natrona Heights	PA	USA	Lee	Capa
Caprica	Monterey Park	CA	USA	Kenneth	Taira
Carolina Online Inc.	Anderson	SC	USA	Gary	Merck
carpeNet Information Technologies GmbH	Hofheim		Germany	Ray	Davis
ChooseYourMail.com	Chicago	IL	USA	Ian	Oxman
Christy Industries, Inc.	Fraser	MI	USA	Shayne	Judkins
Clarity Connect Inc.	Ithaca	NY	USA	Joseph	Lalley

ClearGate Communications, Inc.	Glastonbury	CT	USA	Gene	Tye
Colomotion, Inc.	San Francisco	CA	USA	Peter	Berns
CompuBasix	Corpus Christi	TX	USA	David	Routh
Connections Plus Internet Services	Sumter	SC	USA	Dan	Haughton
ConnectLink Inc	Chescpeake	OH	USA	Phil	Henson
CrimsonWeb Information Systems	La Crescenta	CA	USA	Jason	Ingham
Critical Path Inc.	San Francisco	CA	USA	Shelley	Alger
CSRlink, Inc. (Uplink)	Montoursville	PA	USA	Micah	Brown
CubeXS Private Limited	Karachi	Sind	Pakistan	Aly G.	Ramzan
Cumberland Internet, Inc.	Toledo	IL	USA	David	Glynn
Cyberix, Inc.	Warminster	PA	USA	Kyoungbu m	Park
Cyberport LLC	Clarmont	NH	USA	R. David	Murray
Data Instruments, Inc	Marietta	GA	USA	Stephanie	Haas
Deepwell Internet Services	Fair Oaks	CA	USA	Ian	Briggs
DeMan Communications, LLC	Bellingham	WA	USA	Michael	DeMan
DFW Family Internet Services	Plano	TX	USA	William	Yiu
Didja Net Communications	Pontotoc	MS	USA	Ricky	Robbins
Digital Internet Access Link, Inc.	Springfield	MO	USA	Tim	Hite
Digital Starlight Communications, Inc.	Agoura Hills	CA	USA	Alan	DeRossett
Dimensional Comunications, LLC	Denver	CO	USA	David	Denney
Direct Network Access	Berkeley	CA	USA	Dror	Matalon
Dream Communications, Inc.	Cohasset	MA	USA	Aaron	Sawchuk
dsl.net, inc.	West Haven	CT	USA	John	Jaser
Dundee Internet Services, Inc.	Dundee	MI	USA	Patricia	Rountree
EarthReach Communications, LLC	Appleton	WI	USA	Jeff	Vogt
EAZNet	Safford	AZ	USA	Eddie	Fry
Electro Link Network, Inc.	Elburn	IL	USA	Dan	Graupman
Elite.net	Merced	CA	USA	Gilbert James	Arguelles
EnterAct, LLC	Chicago	IL	USA	Tracy	Snell
Enterprise Information Services, Inc.	Washington	DC	USA	Hasan	Muhamma d
Ericsson Inc.	Richardson	TX	USA	Mike	Litherland
Erols Internet	Springfield	VA	USA	Alec	Peterson
E-world Internet	Fullerton	CA	USA	Charles	Chang
EXP Internet Services	Bridge City	TX	USA	J. Glenn	Hughes
Fastransit Communications, Inc.	West Jefferson	NC	USA	Scott	Knapp
Flordia Digital Turnpike	Tallahassee	FL	USA	Harald W.	Kegelmann
Fort Nocs Inc.	Anchorage	AK	USA	Lance	Ahern
Frazier Mountain Internet Service	Pine Mountain Club	CA	USA	Scott	Rosen
Frontier GlobalCenter	New York	NY	USA	Jason	Zigmont
G.R.I.N. Net	San Francisco	CA	USA	Andrew	Robinson

Global Computer Services, Inc.	Concord	NC	USA	Douglas S.	Childress
Globalnet	Philo	OH	USA	Jeff	Ault
Gotham Amalgamated	New York	NY	USA	Richard	Safran
InterNetworking Corp.					
Ground SystemHouse, Inc.	Olney	MD	USA	Scott	Whittle
Gulf South Internet Services Inc.	Metairie	LA	USA	Richard	Palmer
GulfAccess, Inc.	Naples	FL	USA	Brad	Sprolws
Gweep Internet	Waltham	MA	USA	MegaZone	
Harbor Communications	Painesville	OH	USA	Scott	Leonello
Highfiber Network	Albuquerque	NM	USA	Holly	Steinberg
Hi-Tak International, Inc.	New York	NY	USA	Mintak	Ng
Homebug	Wothington	OH	USA	Alan	Bond
Homenet Communications	Warner	GA	USA	Steve	Berman
	Robins				
Hubris Communications	Garden City	KS	USA	Chris	Owen
Hypernet Communications	Cleburne	TX	USA	Douglas	Bowyer
iHighway.net, Inc.	San Jose	CA	USA	John M.	Brown
I-Land Internet Services	Sedalia	MO	USA	Chris	Young
Infolink Servicios, S.C.	El Paso	TX	USA	Jose A.	Gonzalez
InfoMine Of The Rockies, Inc.	Butte	MT	USA	Phillip J.	Curtiss
InReach Internet, LLC	Stockton	CA	USA	John	Keagy
Insync Internet Services, Inc.	Houston	TX	USA	David	Power
Interactive Telecommunications	New York	NY	USA	Barbara	Steinberg
Program					
InterComm Technologies, Inc.	Otterbein	IN	USA	Bill	Warner
Interconnected Associates	Seattle	WA	USA	Jeffrey	Sterling
Interface Computer Center L.L.C.	Fayetteville	AR	USA	Jeremy	Webb
InterKan.Net, Inc.	Manhattan	KS	USA	Justin	Geering
Intermedia Internet Services	Kingsport	TN	USA	Tony	Falin
International Web Broadcasting	Portland	OR	USA	Joanne	Collins
Corp.					
Internet 1 st	St Louis	MO	USA	Tim	Flavin
Internet of the Sandhills	Southern	NC	USA	Beth	Morgan
	Pines				
Internet Texoma, Inc	Denison	TX	USA	Larry	Vaden
Internet Wizards	Kent	WA	USA	Robert T.	Smithing
internet@vantage, inc.	Honolulu	HI	USA	Sherwood	Pekelo
Iperdome, Inc.	Atlanta	GA	USA	Jay	Fenello
ISP Power Corporation	Honolulu	HI	USA	Marc	Rapoza
ISPNews, Inc.	Plymouth	MI	USA	Michael	Betts
JAJAweb, LLC	San Antonio	TX	USA	Robert G.	Allen
JASKE Internet Solutions	Chicago	IL	USA	Alexi	Touloumis
John Leslie Consulting	Milford	NH	USA	John	Leslie
JPS Online Systems, Inc.	Westerly	RI	USA	John	Sulima
Klondyke's Online Services	Richmond	MI	USA	Maria	Wells
Las Vegas Internet	Las Vegas	NV	USA	Mike	Butler

LGA International	Singapore		Singapor Daniel e	Ang	
LinkAmerica Communications	New York	NY	USA	Rachel	Luxemburg
Linkline Internet Access	Mira Loma	CA	USA	Philip	Ardron
Lockridge, Grindal, Nauen & Holstein	Minneapolis	MN	USA	Christopher	Sandberg
Lucent Technologies RABU	Pleasanton	CA	USA	John	Mann
Lynks Network Services, Inc.	Fayetteville	AR	USA	Calvin	Anderson
Madison County Telephone	Huntsville	AR	USA	Jeremy	Webb
MagicNet, Inc.	Orlando	FL	USA	Robert D.	Thrush
MAP Internet Inc.	Springfield	MA	USA	Grosvenor	Heacock
Maui Gateway	Kihei	HI	USA	George	Fontaine
Maui Net, Inc.	Kihei	HI	USA	Roger	Stout
Maximum R&D	Los Angeles	CA	USA	Mark	Geisert
Meganet Communications. TCIX, Inc.	Fall River	MA	USA	Brian	Wallingford
Memra Software Inc.	Armstrong	BC	CANADA	Michael	Dillon
Mercury Network	Midland	MI	USA	David	Sovereen
MGC Communications, Inc.	Las Vegas	NV	USA	Scott A.	Buften
Michweb, Inc.	Cadillac	MI	USA	Matt	Simerson
Midcoast Internet Solutions	Newcastle	ME	USA	Jason J.	Simonds
Midwest Web Inc.	Painesville	OH	USA	Mark	Canfield
Millennia Communications, LLC	San Diego	CA	USA	Rick	Stevens
Mint City Internet	St. Johns	MI	USA	Barry	Buchholz, Jr.
Moss Communication	McMinnville	OR	USA	Steven P	Schalock
MV Communications, Inc.	Manchester	NH	USA	Mark	Mallett
MVA.NET	Haverhill	MA	USA	Dave	Spaulding
N2 The Net	Cookeville	TN	USA	Kevin W.	Paul
N2H2 Corporation	Seattle	WA	USA	Kevin	Fink
NameSecure	Moraga	CA	USA	Patrick	Greenwell
Net Access Corporation	Newton	NJ	USA	Alex	Rubenstein
Net Carrier Inc.	Telford	PA	USA	Chris	Peltier
Net Crusader, Inc.	Manassas Park	VA	USA	J. Carlos	Castro
Net56+	Palatine	IL	USA	Robert	Strickler
Netaxs	Philadelphia	PA	USA	Avi	Freedman
NetCreations, Inc.	Brooklyn	NY	USA	Rosalind	Resnick
Netmeg Internet	Monroe	CT	USA	Matt	Magri
NetSpace, S.A. de C.V.	Toluca		Mexico	Oscar	Mondragon
Netstarz Solutions	Toomsboro	GA	USA	Harold G.	Powers
Netstep Access Services	Kingston	NY	USA	Robb	Kinnin
Netsurfer, Inc	Atlanta	GA	USA	J. Scott	Williford
Netuser Communications	Cupertino	CA	USA	Greg	Merrell
Network Trend Technology	Shinjuku, Tokyo		Japan	Tateishi	Saigoh

Newport Internet	Newport	OR	USA	Don	Lashier
NFO Research	Greenwich	CT	USA	Mickey	Bennett
Noguska	Fostoria	OH	USA	George	Gibat
NorthPoint Communications, Inc	San Francisco	CA	USA	Matthew J.	Going
Nothin But Net, LLC	Mount Laurel	NJ	USA	Len	Pikulski
NYCPORT Networks	New York	NY	USA	John	Kenney
On-Line Systems	Palatine	IL	USA	Jay	Griffiths
Pact Communication Group, Inc.	Ft. Lauderdale	FL	USA	Camilo	Pereira
Palmer Divide Communications	Monument	CO	USA	Joseph M.	Beggs
Pampa Cyber Net	Pampa	TX	USA	Douglas	Locke
Panda Communications LLC	Santa Cruz	CA	USA	Harry	Landers
PAXnet Communications Inc.	Greenville	SC	USA	James J	Mundy
PCs Made Easy, LLC	Tagard	OR	USA	Ken	Rea
PEGLabs	San Francisco	CA	USA	Tom	English
Penncom Internet Company	Warren	PA	USA	Laura	Megill
Pennsylvania Online LTD.	Harrisburg	PA	USA	George F.	Peace
Pinellas Internet Services	Clearwater	FL	USA	Roxanne	Loveday
Plantaganet Internet Services	Doylestown	PA	USA	James	Smallacom be
Poulton Associates	Salt Lake City	UT	USA	Craig K	Poulton
PressEnter	River Falls	WI	USA	David E.	Bushard
Priori Networks		CA	USA	Timothy	Brown
Priori Networks	Redwood City	CA	USA	Robert	Shearing
Private I, LLC	Louisville	CO	USA	Kevin	Wenzel
Progressive Telecom	Doylestown	PA	USA	Ken	Klosinski
QDO	Lahore		Pakistan	Suhael	Ahmed
Rocky Mountain Internet Junction	Golden	BC	Canada	Terry	Hickey
Rural Communications, Inc.	Cedar Hill	MO	USA	Christopher	Jones
Scescape, Inc.	Aiken	SC	USA	Joe	Bonin
SBBSNET	Saginaw	MI	USA	Jonathan D.	Hozeska
Sentient Networks, Inc.	Milpitas	CA	USA	Sunil	Dhar
ShreveNet, Inc.	Shreveport	LA	USA	Brian	Feeny
SkyCache, Inc.	Laurel	MD	USA	Doug	Humphrey
SLIP.NET	San Francisco	CA	USA	Ted	Glenwright
SoftAplic S/C Ltda	Belo Horizonte	MG	Brazil	Edesio	Costa e Silva
Software Design Associates	Poway	CA	USA	Jeff	Lawhorn
SONET Communications	Lawton	OK	USA	John	Gisclon
Sonoma Systems	Marina del Rey	CA	USA	John	Mazzaferro
Southern Star	Metairie	LA	USA	John R.	Souvestre
SouthNet Inc.	Hamilton	AL	USA	Tony	Williams
Southwest Cyberport	Albuquerque	NM	USA	Mark	Costlow
SoVerNet	Bellows Falls	VT	USA	Erik	Leo
SparkNET Corporation	Green Bay	WI	USA	Christopher	Knight

SpeedLink	Pontiac	MI	USA	Melih	Oztalay
Stevens Enterprise	Beaumont	TX	USA	Kenneth M.	Stevens
Surfari Internet Provider Services	Grover Beach	CA	USA	Kent	Crow
Sutter Yuba Internet Exchange	Yuba City	CA	USA	David	Overton
SYIX.COM					
TDI Internet, Inc.	Monroe	MI	USA	Tom	Bilan
Telalink Corporation	Nashville	TN	USA	Bob	Collie
Telechoice	North	NJ	USA	Neville	O'Reilly
	Brunswick				
Teleport Internet Services	Portland	OR	USA	James S.	Deibele
Televolve, Inc. (San Francisco Online)	San Francisco	CA	USA	William	Sommers
TeQ Works!	Edmonton	Alb	Canada	Kevin	Crocker
Texas Networking, Inc.	Austin	TX	USA	Ron Barron	Yokubaitis
The Binary Bin	West Deptford	NJ	USA	Brian	Waters
The Foxberry Network Inc.	Monroe	MI	USA	Thomas	Fox
The UserFriendly Network	West Reading	PA	USA	Michael	Weiner
Thevoid.net	Studio City	CA	USA	Dean	Schinnerer
Tigerden Internet Services	Dayton	OH	USA	George	Nemeyer
TriloBYTE Services, Inc.	Tooele	UT	USA	Michelle	Lawrence
Union Net	Baltimore	MD	USA	M.C.	Motsko
Universal Internet, LLC	Carmel	CA	USA	Brian	Steckler
US Xchange, LLC	Grand Rapids	MI	USA	Scott	Brew
UsefulWare Inc.	Marietta	GA	USA	John	Foltz
Valhall Access	Welland	ON	Canada	Kitty Sue	Morgan
VCNet	Camarillo	CA	USA	Bob	Rust
VECTNet	Tucker	GA	USA	Charles T.	Smith, Jr.
Verio RustNet, Inc.	Livonia	MI	USA	Lynne	Mullins
Virginia Internet Express	Dayton	VA	USA	Fred R.	McDavid, Jr.
VisiNet	Newport News	VA	USA	Edward	Fang
Visual Link Internet	Winchester	VA	USA	Mark	Bayliss
Web Technologies	Amherst	NY	USA	Shawn P.	Lemay
WebbSite, Inc	Fayetteville	AR	USA	Jason	Webb
WebMasters, Inc.	Horsham	PA	USA	David	Weiner
Wizvax Communications	Troy	NY	USA	Richard	Shetron
WTS OnLine	Dallas	TX	USA	Gerry	Dalton
Xcom	Cambridge	MA	USA	John	Johnson
Yosemite Network	Mariposa	CA	USA	Mike	Bird
Zocalo	Berkeley	CA	USA	Bill	Woodcock

Certificate of Service

I, Mitchell Lazarus, an attorney with the law firm of Fletcher, Heald & Hildreth, P.L.C., hereby certify that on this 8th day of October, 1998, I caused copies of the foregoing "Reply Comments Of The Internet Service Providers' Consortium" to be delivered by hand to the following:

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